

Decision Notice
For the Potential Reintroduction of Bighorn Sheep into the
Bridger Mountains, Southwest Montana

Prepared by Region 3, Montana Fish, Wildlife & Parks
December 7, 2012

Proposal

Montana Fish, Wildlife and Parks (MFWP) is proposing to reintroduce Rocky Mountain bighorn sheep into the Bridger Mountains of southwest Montana. Like most mountain ranges in western Montana, the Bridgers once supported a native population of bighorn sheep into the late 1890's and perhaps into the early 1900's. The purpose of the reintroduction is to establish a long-term viable bighorn sheep population in the Bridgers. A viable population would provide new recreational opportunities to include wildlife viewing and sport hunting. Biologically, a new bighorn population in the Bridgers would increase biodiversity and restore a native species to the ecosystem after a 100-year absence. From a conservation perspective, increasing the number and distribution of viable bighorn sheep populations in Montana has a long-term survival benefit for the species.

Montana Environmental Policy Act (MEPA) Process

The proposal was outlined by MFWP in an Environmental Assessment (EA). The purpose of the EA is to satisfy the letter and intent of the Montana Environmental Policy Act (MEPA). MFWP is required through the MEPA process to assess the potential impacts of this project on the human and natural environment. The EA was the focus of a Public Meeting and was also distributed to interested parties, was available upon request and was posted on the MFWP website. A 22-day public comment period on the proposal was held from November 5-26, 2012. The Final EA provides the MFWP Decision Maker (MFWP Region 3 Supervisor) with the best available information to assist in evaluating the project and deciding whether to approve, not approve, or modify the proposed action in a Decision Notice. The proposed action is then subject to approval by the MFWP Commission.

Issues Raised in the Environmental Assessment (EA)

The EA describes management issues and alternatives in detail. In summary, MFWP would manage for a restored population of 160-350 bighorn sheep. As the population increases, MFWP biologists will recommend if and when sport hunting would begin. Establishing recreational hunting to manage bighorn numbers and to provide new hunting opportunities is an objective of most bighorn sheep transplants. Typically, newly transplanted bighorn sheep are not hunted until they have reached 80% of a Minimum Viable Population (N=125) or approximately 100 bighorn sheep and there is sufficient annual recruitment to maintain herd growth while allowing for the anticipated harvest. Bighorn hunting seasons are managed by issuing a small number of licenses through an established limited drawing system. Initially, a small number of ram licenses (2-5) would be issued. Sheep seasons typically run from early to mid September to late November. If necessary, trapping and transplanting live bighorn sheep is an option to manage population size.

Summary of Public Comments

Immediately following the release of the Draft Bridger Mountains Bighorn Sheep EA a 22-day public comment period on the proposal was held from November 5-26, 2012. Public comment was solicited from interested individuals and groups. A Public Meeting on the proposal took place from 6-8 PM on November 15, 2012, at the MFWP Region 3 Headquarters in Bozeman. Interested parties were encouraged to comment on the proposal verbally at the Public Meeting, in writing, or by email to a designated MFWP address.

About 20 members of the public attended the Public Meeting on November 15, 2012. The verbal comments of 14 individuals were summarized (Appendix A). Nine individuals supported the release of bighorns in the Bridgers, 3 people opposed the release of bighorns, and 2 people made comments and asked questions but did not clearly indicate their preference one way or the other (see Appendix A).

Seven comments were made in writing during the November 5-26, 2012, comment period (Appendix B). Three individuals supported the release of bighorns in the Bridgers, 1 person opposed reintroduction, 2 groups supported the reintroduction, and 1 group recommended that the MFWP Commission conditionally direct MFWP to move forward over the next year, to see if further collaborative agreements referred to in Alternative C may be reached, and to strive toward moving the proposed bighorn transplant from a high-risk disease transmission category to at least a moderate if not low-risk category (see Appendix B).

Twenty-six comments were made by individuals and groups via email during the November 5-26, 2012, comment period (Appendix C). Twenty individuals or groups supported the release of bighorns in the Bridgers and 6 people opposed the release of bighorns in the Bridgers (see Appendix C). Public comment varied from short brief statements with little detail to longer comments with considerable detail and explanation (Appendix A-C).

Additional Questions or Issues Raised During the Public Comment Period

Under Alternative C, will the potential release of bighorn sheep be contingent upon completing voluntary domestic sheep management agreements with all sheep producers in the area, with the majority of producers, or with a certain number of producers depending on the size and location of their operations?

If Alternative C is selected each voluntary domestic sheep management agreement will be individually negotiated on a case by case basis reflecting the unique circumstances of each producer. The EA implies that voluntary domestic sheep management agreements should be completed with all local sheep producers prior to the release of bighorn sheep. The more agreements and mitigations in place, the greater the chance of reducing the risk of disease transmission. As mentioned during the Public Meeting the Decision Maker has the ability to modify alternatives and select something else along a decision gradient which could alter the parameters of Alternative C.

If Alternative C is selected is there a time frame or time limit for completing voluntary domestic sheep management agreements?

There has been no decision made regarding a time limit or time frame for negotiating voluntary domestic sheep management agreements. If Alternative C is selected the issue of time frames will be discussed and decided upon at that time, however a time frame of one year may be appropriate.

During the EA comment period new information has surfaced regarding the number, location, and project support of local sheep producers.

Prior to the comment period MFWP was aware of at least 10 small, medium or large sheep producers within 1.5 to 12 miles from the bighorn sheep release site. At that time it was our understanding that none of the sheep producers were opposed to reintroducing bighorn sheep in the Bridgers. MFWP was aware of local cattle ranchers who were and still are opposed to the transplant. During the comment period MFWP learned that one sheep producer located 4 miles from the release site is opposed to the reintroduction due to potential negative impacts on his sheep operation. During the comment process we also learned about the presence of 4-5 4H domestic sheep projects located within 2-3 miles of the Bridgers. 4H projects that involve raising sheep for short periods of time present a risk for disease transmission to bighorns, however the risk is considered somewhat less than the risk from commercial herds.

MFWP should express the management concerns and consequences of local sheep producers in more detail.

During the Public Meeting and in prior conversations local sheep producers expressed their concerns about management issues related to trying to achieve effective separation between

domestic sheep and bighorn sheep. From their perspective there are significant challenges and costs of implementing separation efforts to include the additional costs of fencing or possible “double fencing”, the impact of moving sheep to new and/or protected locations when bighorns are in the area, purchasing, training and maintaining guard dogs or other guard animals, the need to spend more personal or hired employee time watching or moving sheep, and the potential to attract bighorns when feeding domestic sheep in winter. Producers also realize that despite considerable cost and work there is no guarantee that these efforts will be successful in preventing disease transmission. One producer mentioned the additional challenge he faces because he does not own the land that he uses to graze sheep. He is uncertain how the landowner would respond to investment/construction of fencing or other improvements, or changes in his grazing operation. Who would own or pay for needed improvements? Each producer’s situation is different, and may change from year to year through growth or reduction in herd sizes and locations where sheep will be grazed. Under Alternative C, producers and MFWP would develop specifically designed voluntary domestic sheep separation agreements unique to each operation. MFWP realizes that reaching these agreements will be extremely challenging. The purpose of Alternative C is to address the high risk of disease transmission and to reduce the risk of a bighorn sheep die-off.

Can landowners be held responsible for bighorn sheep transplant failures?

Under the Roles and Responsibilities section of MFWP’s Cooperative Agreement for Trapping/Transplanting of Bighorn Sheep or Augmentation of Existing Populations (See EA; pg. 78) MFWP “Assumes the risk of transplant failure holding no landowner responsible.” In MFWP’s Protocols for Trapping and Transplanting Bighorn Sheep to New Areas and Augmenting Existing Populations (See Montana Bighorn Sheep Conservation Strategy, 2010, pg. 65) MFWP “Assumes the risk of transplant failure, holding no landowner or public grazing allotment lessee responsible without proof of negligence or intent.”

Aren’t there better or easier places in Montana to reintroduce bighorn sheep with fewer potential problems?

By many measures MFWP’s bighorn sheep transplant program has been a success. Between 1942 and 2009, MFWP captured and released 2,028 bighorn sheep in 55 different locations in Montana, not to mention bighorn sheep that have been transplanted to start new populations in other states. In Montana bighorns have been restored to many previously occupied mountain ranges in western Montana and to the Missouri River Breaks and other locations in eastern Montana. During this process all of the “easier” transplant sites with few problems have received bighorn transplants. There are no “easy” transplant sites left to choose from. Currently the Bridgers is the only area in Montana that has risen to the level of a potential bighorn sheep transplant site, due in part to previous transplant efforts in the mid 1990’s and continued local interest.

Considering the high risk potential for disease transmission in the Bridgers and expert recommendations on a minimal domestic sheep/bighorn separation of 14 miles why would we want to proceed here?

MFWP and the MFWP Commission has the responsibility to consider and evaluate significant public requests to transplant bighorn sheep in Montana through the MEPA process. Owing to previous proposals and efforts to reintroduce bighorns into the Bridgers and continued public interest the Commission and MFWP decided to evaluate this proposal again in light of new information and MFWP's new bighorn sheep management plan guidelines adopted in 2010. The EA has clearly determined the Bridgers to be a "high-risk" area for disease transmission from domestic sheep to bighorn sheep due to the proximity of several domestic sheep herds. MFWP and other respected sources do not recommend placement of bighorn sheep within 14 miles of domestic sheep herds without clear physical separations (i.e., major highways, rivers, double fencing, or other barriers). The "red flag" of at least 10 sheep herds within 1.5 to 12 miles of bighorns led to the development of Alternative C which attempts to create physical separation through voluntary domestic sheep management agreements with local sheep producers. All parties recognize that achieving these agreements will be challenging. We are proceeding with this proposal to determine if there is sufficient landowner cooperation to reduce disease risk enough to eventually move forward with a reintroduction.

In some places in Montana bighorn sheep are attracted to roadways in search of salt mixed with sand to improve winter driving conditions. This caused vehicle accidents and the loss of many bighorn sheep. Does this situation exist in the Bridgers or was it considered in the analysis of this project area?

Vehicle-related bighorn sheep mortality has been a problem in some places in Montana (e.g., Anaconda, Thompson Falls, Bonner, Big Sky). As mentioned, roadway salt (or salt present in roadway sand) has been linked to attracting sheep into harm's way. This issue was not specifically mentioned in the EA because on the west side of the Bridgers, the area where the transplant will occur and the bulk of winter use is expected to remain, most bighorn habitat does not contain paved roads so maintained. Since bighorns have not occurred in the Bridgers for 100 years we do not have any evidence of them using roadway salt. This issue is a concern and if the project proceeds MFWP will monitor the use of roadways by sheep in the winter. The paved Bridger Canyon Road could be an area of concern. In areas where this issue has surfaced MFWP attempts to mitigate the problem by encouraging road maintenance departments to use non-salt chemicals on roadways where sheep occur and through signs warning the potential for sheep on roadways.

Has MFWP's Habitat Evaluation Procedure (HEP) which estimates how many bighorn sheep an area can support been validated for accuracy in predicting population levels using existing viable populations?

According to MFWP's GIS/Natural Resources Data Analyst, this has not yet been done in a formal way. Habitat models have been run for existing populations, but there has not been biologists' feedback to how they performed on a large scale.

Based on previous relocation experiences, what is an estimate of years/decades to a huntable population? Would this result in additional releases and cumulative effects?

The length of time required to reach a huntable bighorn population varies with each location. Some areas may reach a huntable population within 5-10 years (e.g., the Elkhorns) and some areas have never reached a huntable population (e.g., Mill Creek; south of Livingston, released in the late 1980's). Each location is different. The Montana Bighorn Sheep Strategy recommends an initial release of at least 30 bighorns and depending on the results of the first release allows for follow up releases of additional animals. The use of additional releases would depend on the success of the first release and the availability of additional bighorns for augmentation.

Sheep die-offs have significant financial and social costs. Do you have any examples of initial and follow up costs (dollars, personnel time, landowner relations) of sheep die-offs?

The costs of dealing with a bighorn sheep die-off are variable depending on how the die-off proceeds, how accessible the sheep are, how long the effects linger, how many people are involved, and how many samples are collected and tested. The Elkhorns bighorn sheep die-off required the efforts of 3 Wildlife Lab employees, 2 FWP Biologists, and 2 FWP Field Technicians for 4-7 days each, and the processing/disease testing of 20 sheep. The estimated personnel costs were \$5,500 plus \$4,000 for disease testing, for a total estimated cost of \$9,500. The FWP Region 2 bighorn sheep pneumonia die-off event required the efforts of 2 people per day for at least 20 days and the testing of a large number of bighorn sheep. The estimated personnel costs were \$6,400 plus \$20,000-\$40,000 for disease testing for a total estimated cost of \$26,400-\$46,400. We do not have an estimate of the "cost" to landowner relations, but die-offs are understandably emotional events for all parties involved.

The EA underestimates the potential for conflicts between bighorn sheep and subdivisions in the area from Sypes Canyon south to the "M" through the mouth of Bridger Canyon. There is a risk of a "boutique" sheep herd establishing there which could effect harvest potential, land and trail use, vehicle collision and personnel response time and cost.

As mentioned in the EA, bighorns are likely to use only a small portion of the project area. Exactly where and when bighorn sheep will occur will be decided by them as they explore and become familiar with available seasonal habitat. Bighorns may use the Sypes Canyon to the "M" area, but whether or not significant problems will occur is impossible to predict. This area is already used by deer, elk, and other wildlife without creating significant management problems or "boutique" wildlife populations. MFWP accepts the possibility of having to respond to wildlife calls in this area the same as we do elsewhere. Considering the extent of accessible

public land and the probable distribution of bighorns during the fall hunting season, we do not anticipate any access or harvest- related problems.

The EA lacks and estimation or discussion of costs versus benefits of reintroductions to MFWP and society. Cost/benefit ratios would be valuable in evaluating this proposal.

It is often difficult to derive meaningful cost to benefit ratios for wildlife management programs or projects. Certain values and benefits related to wildlife management do not have dollar values or are difficult to quantify. There are a few pertinent figures that are available. As mentioned in the EA the estimated current cost of transplanting bighorn sheep is \$900-\$1,000 per bighorn. At that rate an initial transplant of 30-40 sheep would cost \$27,000-\$40,000. This does not include an estimated cost of \$5,000 for completing the MEPA EA process. MFWP annually estimates hunter use expenditures by wildlife species. For license year 2011 MFWP (Statewide and Regional Hunter & Angler Use and Expenditures Sheet 2012) estimates that bighorn sheep hunters spent an estimated \$822,000 in Montana with \$42,330 spent in Region 3. The per hunting day expenditure for nonresident sheep hunters in 2011 was \$247.35 while resident sheep hunters spent an estimated \$47.39/day. The financial benefits of non-consumptive wildlife viewing activities are not estimated. Another financial benefit of maintaining healthy bighorn sheep populations in Montana is the annual bighorn sheep license auction. Beginning in 1986 MFWP has been able to auction one bighorn sheep license each year to raise money for bighorn management to include funding for transplanting bighorns, aerial survey and monitoring efforts, habitat acquisition and easement, and research projects. The 2010 bighorn sheep auction license sold for \$275,000. From 1986-2010 bighorn sheep auction licenses have sold for \$3,975,500.

If Alternative C is selected and implemented will the landowner or MFWP be financially responsible for maintaining species separation?

At this point the funding sources for any mitigation efforts related to implementing Alternative C have not been identified. As mentioned in the EA, ideally outside sources (state, federal, private, NGO's) would fund such projects so as not to burden the landowner with additional costs. However, prior to negotiating sheep separation agreements or knowing the extent of mitigation needed, it is premature to identify or eliminate any possible funding sources. Funding will likely come from several sources. It should be noted that during the comment period several interested individuals and groups indicated an interest in supporting domestic sheep mitigation efforts.

The EA should recognize that the time periods when bighorn sheep/domestic sheep interactions are most likely to occur are in the fall and early winter and focus any efforts to manage separation during that time of year.

Contact between domestic and bighorn sheep can occur year round. However, the risk for comingling may increase during the fall when young bighorn rams are dispersing from family or ram groups. Also during the winter bighorns may move to lower elevations near domestic sheep

to find more available forage. The risk of comingling can also increase significantly during spring green-up when lower elevation grasses and forbs begin to grow providing an attractive food source for both species.

Final Environmental Assessment

Based on public comment there are no necessary modifications to the draft environmental assessment. That draft along with this Decision Notice will serve as the final environmental assessment for this proposal.

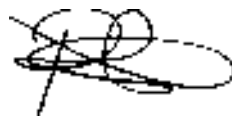
Decision

Based on the environmental assessment and public comment I am selecting Alternative C to further pursue the opportunities for reintroducing Bighorn Sheep into the Bridger Mountains.

It is clear that currently we do not have the necessary mitigations in place to have a reasonable expectation that we will be successful with a reintroduction of Bighorn Sheep in the Bridger Mountains. Those mitigations must come through the cooperation of existing landowners and sheep owners in proximity to the reintroduction area, as well as through the cooperation of interests that support the reintroduction.

Alternative C calls for agreements with existing sheep owners to foster efforts to mitigate the risk of contact between domestic and introduced Bighorn Sheep. We think those agreements can best be developed through collaborative efforts among neighboring landowners and sheep owners along with Bighorn Sheep advocates. We will support this collaborative effort in the coming months to determine whether any practical agreements can be reached that better mitigate the risks associated with domestic and Bighorn Sheep contact near the Bridger Mountains. We will review our progress towards this end in December of 2013 to determine whether a reintroduction of Bighorn Sheep in the Bridgers has a better opportunity for success.

I find there are no significant impacts on the human and physical environment associated with the selected Alternative C for this project. Therefore, I conclude that the environmental assessment is the appropriate level of analysis and that an environmental impact statement is not required.



Patrick J. Flowers
MFWP Region 3 Supervisor
Bozeman, MT
December 7, 2012

Appendix A

Bridger Mountains Bighorn EA Public Meeting Summary & Comments

On Thursday, November 15, 2012 FWP held a Public Meeting from 6-8 PM at the Region 3 Headquarters in Bozeman on the proposed bighorn sheep transplant in the Bridger Mountains. Prior to the meeting the Bridger Mountains EA was distributed to interested parties and made available on the FWP website. Copies of the EA were also available at the meeting. The meeting was attended by about 20 members of the public, 7 FWP employees, 1 Bozeman Daily Chronicle reporter (Laura Lundquist) and 1 FWP Commissioner (Dan Vermillion).

The meeting started with a Power Point presentation on the proposed bighorn sheep reintroduction given by Julie Cunningham, Bozeman FWP Area Biologist. During the 30 minute presentation people asked numerous questions regarding the project. After answering several additional questions the audience was encouraged to officially comment on the bighorn sheep proposal. Comments can be made in writing on comment forms provided at the meeting, through a designated FWP email site, or verbally at the meeting. The following is a summary of verbal comments made by 14 individuals at the meeting. In addition 2 written comment forms were collected at the meeting. All individuals were encouraged to comment in whatever way they preferred prior to the end of the comment period at 5 PM on Monday, November 26, 2012.

Summary of Verbal Comments (some comments included follow-up questions or clarifications).

Comment #1: (Barbara Brewster; Belgrade) Has been ranching in the Bridgers for 47 years, does not raise domestic sheep. Opposed to reintroducing bighorns based largely on the risk of a bighorn sheep die-off caused by contact with domestic sheep. Believes that FWP should follow the advice of outside bighorn sheep experts, its own people, and the extensive literature regarding the likelihood of a die-off if bighorns come in contact with domestic sheep. Referred to a recent bighorn die-off in Utah where 75% of the population died, she believes the transplanted sheep may have come from Montana. Believes that if sheep are released that they will probably occupy the upper slopes of their property and cause no problems for them, but she does not want to see sheep brought in to simply die. It would be a tremendous loss of sheep and money. Why would we want to do this? She is familiar with 4-5 additional 4H domestic sheep projects within 2-3 miles of the Bridgers that FWP has not yet identified. Commented on problems that “double fencing” of domestic sheep would cause for other wildlife species.

Comment #2: (Glenn Monahan) Strongly in favor of reintroducing bighorns in the Bridgers. He is very concerned that if we don’t continue to transplant bighorns and create new populations bighorn sheep will go extinct in Montana. Fears the loss of a native species. He knows there are problems with some landowners but thinks they can be resolved. We have made mistakes in the

past that have lead to bighorns disappearing but that is not a valid reason not to try again. If we wait longer it will be more difficult, we are losing habitat to subdivisions in many areas.

Comment #3: (Kevin Hurley; Conservation Director, Wild Sheep Foundation, Cody WY) Commented on large number of bighorn sheep die-offs in Montana in the last 2-3 years, many tied to disease transmission from domestic sheep. The relationship between domestics and bighorns is a major problem for the sheep ranching industry in many western states. Proposed bighorn transplants like the Bridgers get “rolled up” into these bigger economic issues and complicate things fast. To answer why try this in the Bridgers...it’s because all of the easy places have already received transplants. There are no “problem free” places left. Commented on the situation in Idaho where they are legislatively mandated to certify that an area has “no risk” of disease transmission before bighorns are transplanted.

Comment #4: (Ward Olson; Belgrade) In favor of reintroducing bighorns. Pointed out the strong conservation heritage of Teddy Roosevelt and others who took risks and took a stand to restore and protect wildlife and public lands. We need that sort of foresight again. Feels that bighorns will be in jeopardy due to genetic problems if we wait too long to create new populations. Domestic livestock are invasive species and on public lands public wildlife should take precedence. We have an obligation to future generations to maintain wildlife species. Tourism contributes 1-2.5 billion dollars to Montana’s economy and wildlife is a big part of that, it helps define who we are as a state. Wildlife is important to the Bozeman area, being the gateway to Yellowstone.

Comment #5: (Becky Weed; Belgrade) Sheep producer in the Bridgers. Has concerns about using “double fencing” to separate domestics from bighorns. Additional fencing would create ecological hazards for other wildlife and would be a bad precedent to set. Double fencing is not a guarantee of separation and if it were required of producers she could not support it. Felt that the EA should express private land management consequences in more detail. There is a need for educational outreach on bighorn separation with sheep producers, particularly smaller ownerships. She believes that wool grower groups may be interested in pursuing this project if sheep owners would not be held responsible for a bighorn sheep die-off. Believes it would be a good idea to team up with MSU in designing a cooperative study related to the release of sheep in the Bridgers. Sees this meeting as the beginning stage of working together to solve the domestic sheep issues.

Comment #6: (Glenn Hockett; Gallatin Wildlife Association, Bozeman) Supports releasing bighorns in the Bridgers but does not want to see them die. Wants to see the bighorns stay on public land and does not want them forced onto private land where they are not wanted. Wants to re-establish a population in the mountains. We must work together with all parties. He is against most double fencing situations, does not want to force things on landowners. Need to proceed in the spirit of cooperation and not infringe on property rights. Try innovative things and get Dr Bob Garrott of MSU involved in a cooperative study. Conservation groups like the Wild Sheep

Foundation or the National Wildlife Federation may be interested in helping with domestic sheep mitigation efforts.

Comment #7: (Ron Biggs; Belgrade) Brother of Bridger Mountain sheep producer. He and his brother Rob (sheep producer) are opposed to reintroducing bighorns in the Bridgers. Does not believe the odds of it working are very good. Believes it will be unsuccessful. Why try it here, there must be better places? Why in the fastest growing part of the state? This is another attack on property rights. Landowners already get hounded by too many hunters that get into trouble and illegally kill game. Bighorns would just add to the problems with people. Mr. Biggs indicated that Jake Callentine and Dick Morgan, both cattle ranchers in the Bridgers, are also opposed to the bighorn transplant.

Comment #8: (Jake Gryzb) Works on the Rich Harjes sheep ranch in the Bridgers. Indicated that the Harjes sheep ranch is all for the bighorn reintroduction however they have some issues related to their operation and potential mitigations. They run a maximum of about 1,000 sheep every year (starting with a core herd of 400 ewes). From May to October all but 100 sheep are pastured in Whitehall. They bring them back to the Bridgers for the late fall/winter. Much of the Bridger land they use is leased for grazing and it would be difficult to build fences or make other management changes on land they do not own. They use several guard dogs but they know that dogs are not fool proof solutions for separating animals. Right now they are feeding hay to their sheep and deer are coming into the feed lines, they assume bighorns may do the same. Lack of land ownership makes long term management difficult to predict.

Comment #9: (Jimmy Wisman; Bozeman) Would like to see FWP reintroduce bighorns in the Bridgers. Realizes that there is a risk of a disease die-off, but we should go ahead for the sake of the bighorns. There should be a way of going ahead but have an agreement that FWP would not blame the producers if the project fails and bighorns die as a result of domestic sheep diseases. Producers should be held blameless.

Comment #10: (Alex Russell; Bozeman) Supports reintroducing bighorns. He is involved in economic development in the Bozeman area. Believes there would be a great economic “upside” to having bighorns where they could be viewed by the public. It would be another unique attribute of the Bozeman area that could be used to sell the area to new businesses and residents. It would be very “cool” to have visitors walk up to the “M” and see bighorns. It would be great PR for FWP as well.

Comment #11: (Karen LaPlant; Belgrade) Not in favor of the bighorn project. Has real concerns about landowners being held liable or to blame for a disease die-off. Asked about what laws or regulations there are concerning this.

Comment #12: (Mark Albrecht; Bozeman) Supports reintroducing bighorns. Recognizes that there is risk, probably high risk of disease transmission, but we need to try to minimize the risk

somehow. We probably can't reduce risk to zero. Should decide on what a reasonable risk level is. Should tear down fences that separate people on this issue, build cooperation, find middle ground between people...can't go full steam ahead and everyone else be damned. What are we going to do with surplus bighorns from Wild Horse Island in the future if we don't have a place to put them?

Comment #13: (Peter Brown; Bozeman) Supports a bighorn sheep reintroduction. He works for a youth volunteer organization in Bozeman and would like to offer their services if there was an opportunity to help out with some of the domestic sheep mitigation projects on private land.

Comment #14: (Bill Mealer; Safari Club International, Bozeman) In favor of reintroducing bighorns in the Bridgers. Commented that watching bighorn sheep rams fighting during the breeding season is one of greatest wildlife spectacles in the world. We should do whatever we can to preserve bighorns for future generations and protect wild lands from being developed. Mr. Mealer also provided written comments.

Following the meeting, the Bozeman Daily Chronicle ran an article on Sunday, November 18, 2012 describing the project and the public meeting. See article below.

Bighorn's return to Bridgers moves forward

By LAURA LUNDQUIST
Chronicle Staff Writer

Hikers regularly see deer and the occasional elk while trekking local trails. But by next summer, those wandering the Bridger Mountains could bump into a bighorn sheep.

The Department of Fish, Wildlife & Parks has finished an environmental assessment of a plan to reintroduce bighorn sheep to the Bridger Mountains, and biologist Julie Cunningham discussed the findings at a public meeting Thursday night at the Bozeman FWP office.

The goal would be to develop a thriving herd for hunting and to ensure biological diversity, continuation of the species and maybe interbreeding with the Gallatin herd to the south.

"There's a lot of opportunities in the Bridgers," Cunningham said. "The Bridgers could support 160 to 350 sheep, based upon our models, although 350 is probably not likely."

Support for the reintroduc-



CHRONICLE FILE PHOTO

A bighorn sheep nibbles on a branch along the Yellowstone River near Gardiner in this January 2010 photo.

tion has been growing over the past three decades, and FWP published a similar environmental assessment in 1994, but no action was taken.

The proposed area, which covers the Bridger Range, is 85 percent public land and has been home to bighorns before. The last sheep disappeared in the early 1900s, possibly because of overhunting, competition with livestock or disease.

Disease remains the main barrier to building a healthy herd once it's on the ground. Bighorn sheep are very susceptible to disease from domestic sheep, and epidemics have wiped out herds of bighorns. So

biologists usually try to eliminate intermingling between the two species.

In other regions of the West, where sheep ranchers use public land grazing allotments, that can be a problem. Fortunately, no sheep graze allotments in the Bridgers.

However, 10 producers raise sheep west of the foothills within 12 miles of the reintroduction site along Middle Cottonwood Creek, and that's not too far for bighorn sheep to wander.

"Nose-to-nose contact with domestic sheep can result in catastrophic all-age die-offs in wild sheep," Cunningham said. "Our sheep plan says that there

should be a 14-mile separation between the release site and domestics. This would be a high-risk reintroduction."

The environmental assessment produced three alternatives: no transplant, transplant regardless of landowner mitigation or hold off transplant until work could be done to reduce the risk of disease.

Sheep producers can reduce the risk of nose-to-nose contact by installing double fencing.

Cunningham spent the summer talking to more than 30 landowners in the area to poll their acceptance of bighorn sheep.

More SHEEP | C4

Sheep/from C1

Aside from a few who have yet to be contacted, only five opposed the plan. Three of those didn't mind sheep but didn't want the traffic from hunters and photographers, Cunningham said.

None of the sheep producers were opposed. Most were open to adding fencing, but a few wanted no changes even if FWP paid for it. So they present a risk.

Other concerns from 1994 comments included wild sheep competing with other ungulates or cattle for forage or effects on recreation or motorized use.

FWP would transplant 30 to 40 sheep initially at a cost of \$900 to \$1,000 a sheep. The project would be funded by money raised in the annual bighorn sheep license auctions.

The sheep would probably come from Wild Horse Island in Flathead Lake and could be transplanted as early as spring 2013 if the FWP commission approves the plan in December.

Public comment is open until Nov. 26. Contact Julie Cunningham at 994-6341 or juliecunningham@mt.gov.

Laura Lundquist can be reached at 582-2638 or llundquist@dailychronicle.com. Follow her on Twitter at [@llundquist](https://twitter.com/llundquist).

Appendix B

Bridger Mountains Bighorn EA Written Comments

The following comments were made in writing during the November 5-26, 2012 public comment period:

Comment #1: (Bill Mealer; Bozeman) I favor alternative B. Bighorn sheep should be reintroduced into the Bridger Mountains. Local sheep producers should not be blamed for a die off if it occurs from wild bighorns contacting their domestic sheep. This should be a no fault introduction agreement between FWP and local landowners. Local landowners should not have the right to stop replacement of native wildlife into their native public lands. There are public rights regarding our federal lands just as there are private property rights. We need more bighorn sheep in Montana to maintain genetic diversity in this wildlife species. Human growth expansion will make wildlife expansion more difficult in the future. It is time for action to restore bighorns to our public lands.

Comment #2: (Joe Gutkoski; Bozeman) The Bridgers Mtns. are historic BH habitat. I support BH reintroduction in the Bridgers. It is most important for esthetic purposes that BH be introduced in the Bridgers. BH in close association with larger human populations in Gallatin Valley can generate esthetic joys in observing wild BH so close to large human population. Whether we hunt BH sheep in the Bridger Mtns. or not hunt is not important. The very existence of BH is most valuable for their esthetic value. Asking private landowners to agree to allow hunters to hunt beyond their property on public land prejudices the objective of reintroducing BH sheep. BH observed by tourists can be a large source of employment and tourist dollars spent in Montana.

Comment #3: (Glen & Elizabeth Neville; Superior) We highly agree the reintroduction for Bighorn Sheep in the Bridger Mountains would be ideal. By planting healthy sheep and putting salt in the area to entice them to stay there perhaps keeping them from going down to roadways to obtain salt, they could survive and multiply. Wonderful idea, go for it.

Comment #4: (Gray Thornton & Kevin Hurley; Wild Sheep Foundation, Cody, WY) Recommend that MFWP moves forward over the next year to see if collaborative agreements with sheep producers may be reached that would reduce disease transmission from “high-risk” to “moderate” if not “low-risk”. See attached 3-page letter written on behalf of the Wild Sheep Foundation.



November 21, 2012

Julie Cunningham
Montana Fish, Wildlife, & Parks
1400 S. 19th Avenue
Bozeman, MT 59718

Dear Julie:

The Wild Sheep Foundation (WSF) wishes to provide this letter on the proposed bighorn sheep (BHS) transplant into the Bridger Mountains, outside of Bozeman. While this letter is independent of what our Montana WSF Chapter may provide, WSF Conservation Director Kevin Hurley has been in phone contact with MT-WSF Executive Director Jim Weatherly, and via email contact with MT-WSF President Mike Menke. We're also glad Kevin was able to attend and participate in the MFWP November 15th public meeting in Bozeman.

We appreciate and commend MFWP's time and effort in conducting an assessment of this proposed transplant, somewhat based on the 1994 analysis/EA that was conducted. It is not clear to us why this transplant was shelved following the 1994 EA, but we're assuming it had to do with many of the same issues/concerns that continue to exist, at present.

The biggest "red flag" for us is the proximity of at least 10 domestic sheep (DS) operations on private land at the base of the western slope of the Bridgers. By MFWP's own analysis, these private-land DS operations occur within 1.5- to 12-miles of the proposed release site (i.e., Middle Cottonwood Creek). While we recognize that no DS grazing allotments occur on Gallatin NF public lands, we remain very concerned about potential contact between wandering BHS and private-land DS off-forest. We feel that MFWP wildlife veterinarian Dr. Jennifer Ramsey correctly characterizes this as a "high-risk" proposal, and we are aware that MFWP's statewide BHS conservation strategy calls for no BHS transplants within ~14 miles of DS operations. Also of concern to us would be the potential for newly-released BHS into the Bridgers that might come into contact with DS off-forest, then continue to wander, possibly moving south toward established BHS populations in the Gallatin Range, south of I-90.

As Kevin stated at last week's Bozeman public meeting, we recognize that "easy" BHS transplants have already been done, and we realize that MFWP continues to search for BHS transplant sites that have adequate spatial/temporal separation or physical barriers to contact between BHS and DS. We appreciate the amount of work that has gone into this proposal, and we also recognize the frustration of area sportsmen who have worked on this concept for almost two decades. But, it must be clearly noted that this BHS transplant includes many difficult components that must be addressed/mitigated, before this transplant can be further considered.

Around the West, there has not yet been much success in mitigating risk of contact between BHS and DS on private lands. The concept of double-fencing has been attempted in a few places, but those have been very localized, on small-scale (1-4 acres) pastures/settings. From statements made in MFWP's EA, some DS operators on private land are willing to not only help monitor,

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then notify, MFWP about wandering BHS, some are also willing to consider small-scale double-fencing strategies, especially if someone else (i.e., sportsmen, NGOs) foots the bill. Other DS producers have stated they are not interested in this kind of mitigation, regardless of who pays. It should be re-emphasized by MFWP that potential double-fences would be for very localized, small-scale settings, not for large-scale range fencing.

Alternative B to simply turn BHS loose is unacceptable, as presented. Alternative C hinges on development and signature on voluntary agreements with DS operators on private lands. As discussed at last week's public meeting, it should be clearly stated if 100% of private-land DS operators must agree to these voluntary individualized mitigation agreements, or if a majority of strategically-located DS operations are willing to sign/cooperate.

It should also be understood that a suite of Best Management Practices (BMPs) that might be agreed to are largely untested, so expectations for BMPs to be successful should be rationally set. It would be helpful for MFWP to state what their measures of success for this BHS transplant would be, in addition to what criteria would be used to judge this (or any other) BHS transplant a failed effort. Livestock protection/guard dogs remain an unproven BMP to physically preclude BHS from approaching/interacting with DS. Issuance of BHS-"take" permits to private landowners has occurred in other western states (e.g., Oregon, Wyoming) dealing with this same issue, since agency personnel cannot be present everywhere, at all times. The need to radio-collar a high percentage of released BHS, preferably with "real-time", downloadable GPS collars, will be costly, but will also offer heightened monitoring of BHS daily/seasonal movements and dispersal. Furthermore, we think if this BHS transplant was to move forward, there would be an opportunity for validating/testing habitat selection models recently developed by Dr. Bob Garrott and his MSU research team, as part of the tri-state (i.e., MT, WY, ID) mountain goat/BHS study currently underway in the Greater Yellowstone Area.

In our opinion, if MFWP advances a recommendation to proceed to the MFWP Commission, at their December 2012 meeting, or subsequent to that, the only alternative to proceed under would be Alternative C. If the MFWP Commission conditionally approves moving forward with efforts spelled out under Alternative C, we think it is essential that MFWP, transplant proponents, wild sheep conservation organizations like WSF and MT-WSF, private landowners, Montana Wool Growers Association, and others continue an earnest discussion of the potential risks of contact between DS and BHS.

Conditional approval by the MFWP Commission would direct MFWP to continue working on these mitigation strategies and landowner concerns over the next year or so, without absolutely committing MFWP to implementing this BHS transplant in the near future. Conversely, if the MFWP Commission turns "thumbs-down" on this transplant proposal at this point in time, proponents and supporters will no doubt lose enthusiasm, relationships between wild sheep conservation organizations and DS producers will take another step backward, and polarity will be further entrenched. As stated earlier, all the "easy" BHS transplants have already likely been done. If agency and private-sector interests are willing to commit to the hard work necessary to advance a transplant proposal such as this one forward, we feel that is a worthwhile venture. In our opinion, BHS transplants will only continue to get more complex, and more difficult to implement. We don't want to see the interest on the part of the transplant proponents diminish;

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we'd rather see that effort and commitment be directed to finding working, collaborative solutions, among diverse stakeholders.

It is our recommendation that the MFWP Commission conditionally direct MFWP to move forward over the next year, to see if further collaborative agreements may be reached, and to strive toward moving this proposed BHS transplant from a "high-risk" category to at least a "moderate", if not "low-risk" characterization. The Wild Sheep Foundation and our Montana Chapter would like to be involved in this continuing discussion over the next year. By this time next year, we would ask MFWP and the Commission to re-visit this proposed BHS transplant, to ascertain what progress, if any, has been made.

Thank you for the opportunity to review and comment on this proposed MFWP bighorn sheep transplant. We look forward to hearing back from MFWP and the Commission as to their decisions in the coming month.

Sincerely,

Gray N. Thornton

Gray N. Thornton
President & CEO
Wild Sheep Foundation

Kevin Hurley

Kevin Hurley
Conservation Director
Wild Sheep Foundation

cc: Jack Atcheson, Jr, Chairman, WSF
Mike Menke, President, MT-WSF
Jim Weatherly, Executive Director, MT-WSF

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Comment #5: (Jim Weatherly, Montana Wild Sheep Foundation, Missoula) Supports Alternative C if a majority of the domestic operations that present the highest threat to bighorn sheep agree to cooperate. See letter below written on behalf of the Montana Wild Sheep Foundation.



Box 17731 • Missoula, MT 59808

November 25, 2012

Julie Cunningham
Montana Fish Wildlife & Parks
1400 S. 19th Avenue
Bozeman, MT 59718

Dear Julie:

The Montana Wild Sheep Foundation appreciates the opportunity to comment on the above referenced EA. Due to other commitments we were unable to attend your Bozeman public meeting. We did discuss the preliminary EA with Kevin Hurley of the Wild Sheep Foundation and concur with his comments at the meeting.

Thank you for inviting us to the initial meeting on this project along with other interested parties. It was refreshing to hear landowners, domestic sheep producers, the Montana Wool Growers and government land managers express an interest in putting wild sheep in the Bridger Mountains. The Montana Chapter has invested time and money in evaluating the Bridger Mountains for a wild sheep transplant since 1992.

This transplant like many others in Montana has a number of potential problems. The one identified issue that in our opinion prevents the immediate transplant of wild sheep is the proximity of 10 domestic sheep operations of various sizes. We agree without mitigation of these domestic sheep producers the introduction of wild sheep would be "high risk". We feel the issues of additional public use of lands and trail heads due to wild sheep introduction would be minimal. The additional pressure from hunting would be nonexistent since very few licenses would be issued.

Alternative B to release bighorn sheep with no mitigation is unacceptable. Alternative C requires agreements with domestic operations on private lands adjacent to the wild sheep habitat. We feel this is an acceptable alternative if a majority of the domestic operations that present the highest threat to bighorn sheep agree to cooperate. The Montana Chapter is willing to work with the department and other interested parties to find ways to mitigate the domestic sheep disease issues so a transplant might proceed during the winter of 2014.

Thank you for the opportunity to review and comment on this proposed transplant. We look forward to working with the department to advance this transplant.

Sincerely,

Jim Weatherly
Executive Director, Mt Wild Sheep Foundation

Cc: Mike Menke, President, MTWSF
Kevin Hurley, Conservation Director, WSHF
Jack Atcheson Jr, Chairman, WSHF

Comment #6: (Richard Morgan, Morgan Ranch, Belgrade) Is opposed to the reintroduction of bighorn sheep in the Bridgers. The following is a transcription of Mr. Morgan's hand-written letter.

As I am sure you know this is about establishing a band of Rocky Mtn sheep in the Bridger Mtns. I feel that an apology may be in order on my part for not being clearer about my opposition to this when we visited earlier in the year. There is a fairly successful project of a Mtn. goat population in this same area in direct competition with the sheep. There are no known ranchers in the north end of this territory that have not, over the years either been put together or held together at sometime by income from domestic sheep. Should it become necessary at sometime in the future to rely on the same source of income it would most certainly be an exercise in futility because of the R.M. sheep population.

I would like to note also there are a number of ranchers (bonified) in the north Bridgers that not only have decades old grazing permits but also own substantial private grass within the same area, all of which will be put in jeopardy by this experiment. I have received several inquiries from these same people as to just what is going on as they have had no contact nor request for their opinion from the F & G. They like me are very concerned about the competition for forage, access, control of private property and on & on. It appears that the mtn sheep population has truly been flourishing in Montana so to be perfectly candid – what gives here? Please share this letter with Pat Flowers. Thanks again.

Comment #7: (James Brown, Montana Wool Growers Association) MWGA recommends that Alternative A – No Action – not be selected by MFWP. MWGA has no preference as to whether Alternative B or C be selected, however they have some concerns about Alternative C (see below). See letter below written on behalf of the Montana Wool Growers Association.

To Whom It May Concern:

These comments are submitted on behalf of the Montana Wool Growers Association and its members. The Montana Wool Growers Association (MWGA) has reviewed the draft Environmental Assessment for the Department's potential bighorn sheep transplant into the Bridger Mountains area. The following constitutes the written comments of the MWGA.

MWGA's membership recognizes and applauds the extensive work and time FWP staff has dedicated to both drafting the Montana Bighorn Sheep Strategy and to finding suitable habitat for bighorn sheep in Montana.

As FWP is aware, the Montana Wool Growers was a partner in the development of the Montana Bighorn Sheep Conservation Strategy. Therefore, the MWGA and its membership have a vested interest in seeing the Strategy's overall goal of establishing five new viable and huntable bighorn sheep populations come to fruition. However, as has been the policy of MWGA throughout the development and implementation of the strategy, MWGA's foremost position is that any support for the Strategy is

conditioned on ensuring that no harm is done to the sheep industry as a result of implementation of the Strategy. More specifically, it is MWGA's position as to this particular transplant that no harm be done to any sheep owner and their agriculture operation.

With this stated, MWGA makes the following comments on the Draft EA.

- On a general level, MWGA and its membership support the concept of introduction of bighorn sheep into the Bridger Mountains. This location is a logical location for placement of bighorn sheep given that the area historically contained bighorn sheep.
- In addition, because of the extensive domestic sheep research conducted at Montana State University in Bozeman, MWGA is excited about the possibility of working with FWP to do bighorn sheep-domestic sheep interaction research through MSU. Further, MWGA and its membership support and emphasize having MSU Animal Range and Ecology Departments involved in research and monitoring of the bighorn sheep population in the Bridgers should the introduction be carried out.
- On a more specific level, MWGA's membership appreciates that the draft EA recognizes that this transplant is ultimately controlled by Montana statute, namely, MCA 87-5-701-721, which provides that this proposed action is prohibited UNLESS the FWP Commission "determines, based upon scientific investigation and after a public hearing, that a species of wildlife poses no threat of harm to native wildlife and plants or to agricultural production and that the transplantation or introduction of a species has significant benefits."
- **As the MWGA has made clear to FWP personnel on numerous occasions, due to the unfortunate lawsuits filed by Western Watersheds in Idaho related to bighorn sheep habitat and the presence of domestic sheep operations, which has resulted in the removal of sheep from federal grazing allotments in various parts of Idaho, MWGA has to consider any transplant of bighorn sheep has a threat to agriculture production in Montana. This is because the very presence of bighorn sheep in an area proximate to domestic sheep grazing opens the possibility of having so-called environmental groups sue to have the domestic sheep removed. This is an unfortunate reality; and a reality that makes it difficult for MWGA to fully partner with FWP on implementation of the Strategy.**
- One of our members has a cattle allotment in the area. However, that allotment may be used for sheep in the future, and MWGA would appreciate some assurance from FWP that should this bighorn transplant be carried out, that FWP will partner with MWGA and the landowner in defending any effort by so-called environmental groups to have this allotment retired or removed as the result of the presence of bighorn sheep in the area.
- In addition, MWGA reminds the FWP that domestic sheep have proven to be a useful tool in combating noxious weeds on public lands. MWGA urges FWP to carefully consider and analyze whether a bighorn sheep introduction into the proposed transplant area will displace targeted grazing efforts, which such grazing benefits all species of wildlife.
- Further, prior to completion/adoption of the EA, MWGA recommends that FWP personnel conduct a meeting with MSU Ecology and Animal and Range Department personnel to discuss some of the beneficial research that could be done as a result of this transplant. There is a good deal of basic research that could be done by MSU personnel on bighorn sheep nutrition and genetics.
- Based on the Associations' review of the draft EA, the membership recommends that the 'no action' alternative not be adopted. MWGA supports FWP taking some action to introduce bighorns into the Bridgers.

- MWGA has no preference as to which of the remaining alternatives, “B” or “C” should be selected by the Department. MWGA does suggest that Alternative “C” appears to be the option that most takes into account FWP’s statutory duty to ensure that the proposed transplant will not harm existing agricultural interests in and around the proposed project location. However, as discussed below, the MWGA has some concerns about this alternative.
- However, alternative “B” appears to be the most workable and the most flexible of the three options. Choosing this alternative would appear, on its face, to provide the Department with an extended time to determine if introduction into this area will be successful. Namely, by introducing a smaller amount of sheep into the area at the onset, there is less likelihood of a large die off should the proposed transplant area prove not to be hospitable to bighorn sheep populations. As recent bighorn die offs have demonstrated, adequate habitat is the primary factor for the success of bighorn sheep transplant effort.
- MWGA appreciates the recognition in alternative “C” of the critical role domestic sheep producers will play in the success of this transplant. This alternative recognizes that negotiated individual agreements with sheep owners operating close to the transplant area will be necessary to ensure proper separation between bighorn sheep and domestic sheep.
- However, the MWGA has concerns about the double fencing requirements discussed in this alternative. In particular, MWGA has concerns about which party will assume the cost of putting up such fencing and which party will be responsible for maintaining the integrity of fencing over time. This is an issue that could use more discussion and better clarification in the final EA.
- In addition, MWGA supports the concept of having domestic sheep producers enter into MOUs with FWP specifying how bighorn sheep-domestic sheep interactions are to be handled. But, given the recent legal cases in Idaho that discounted the legal impact of bighorn sheep MOUs entered into in that state, MWGA would like to see an assurance by the FWP that should these MOUs be challenged in court, FWP would obligate itself to defending the validity of such agreements. Also, in no case should the burden of ensuring separation between bighorn sheep and domestic sheep become the responsibility of any private landowner.
- Further, given the recent trend by some FWP personnel and by the general press to blame domestic sheep producers whenever there is a die off of bighorn sheep in Montana, MWGA would like to see more detailed analysis included in the EA about the possibility of a die off occurring in this area for reasons other than bighorn sheep-domestic sheep interaction. Along this line, based on attending earlier meetings with FWP personnel regarding the possibility of introducing bighorn sheep into the Bridgers, MWGA is aware that there are many environmental factors that may ultimately make this transplant unsuccessful, such as competition among various species of wildlife for forage. MWGA would appreciate both that FWP recognize this possibility in its EA and that FWP provide written assurances to sheep producers operating in the area that they will not be held responsible should die-offs occur in the future. Further, the draft EA should recognize the importance of giving agriculture producers the tools needed to maintain separation between domestic sheep and wild sheep, such as the possible issuance of kill permits to livestock producers.
- The MWGA appreciates that the Draft EA recognizes the important role private property owners will play in the success of transplanted sheep into the areas under consideration. The key to this proposed transplant location, as opposed to the prior one in the Whitehall area, is that the majority of land identified by this project is public ground. Even so, as

noted in the Draft EA, private land ownership and rights will be impacted by this transplant should it occur. For this reason, MWGA is pleased that the Draft EA recognizes that private landowner permission must be obtained prior to reintroduction of bighorn sheep. This portion of the Draft EA is consistent with Montana's Bighorn Sheep Conservation Strategy, which requires landowner approval prior to any reintroduction.

- Building on the private landownership recognition, it is clear to MWGA's membership that there is a high potential for interaction between the transplanted bighorn sheep and domestic sheep outfits operating in the area given that bighorn sheep are likely to move to lower elevations during the winter months. MWGA appreciates that the EA recognizes that there is a high likelihood that conflict between domestic livestock species and bighorn sheep will occur should this transplant be carried out. As noted above, the question becomes whether the landowner should be financially responsible for maintaining special separation, as the draft EA seems to contemplate at this point, or whether FWP should be financially responsible for maintaining desired special separation. The EA addresses this only marginally by stating that "ideally outside sources would fund such projects." See, Page 23. MWGA recommends that the EA is inadequate on this point and should address specifically how such mitigation projects will be funded.
- The membership of MWGA appreciates that the Draft EA specifically delineates the specific release location. As noted in the EA, the release location implicates private land ownership. MWGA notes that whatever alternative FWP chooses, FWP must obtain permission for release of sheep on private lands prior to moving forward. This is because a knowing release of wildlife onto private lands constitutes an interference with private land ownership and an invasion of constitutionally protected property rights. In this vein, MWGA recommends that the final EA include language noting specifically that the Department recognizes that it is reintroducing bighorn sheep into areas where there are known, existing domestic sheep operations and that the Department is assuming the risk of any bighorn deaths as a result of reintroducing sheep into areas proximate to existing domestic sheep operations and any resulting interactions between the two sheep populations.
- MWGA's membership also commends the department for revisiting the issues that were raised in 1994 when FWP last considered transplanting bighorn sheep into the Bridgers. FWP has done a thorough analysis of the issues that played a part in stopping the 1994 reintroduction. However, MWGA takes exception to the insinuation reached in Issue #2, disease transmission, p. 14, that domestic sheep were or are the source of the die offs experienced in Montana. Many of these die offs occurred in places where there were no domestic sheep operations. MWGA does not disagree with the use of spatial separation as a management tool; however, MWGA asserts that more research is needed on the issue of bighorn sheep-domestic sheep disease transmission and, correspondingly, objects to any management action to the extent it is based solely on the assumption that domestic sheep are the source of pneumonia outbreaks in bighorn sheep populations.
- MWGA's membership appreciates the recognition and discussion in Issue #2 and Issue #3, pp. 14-20 of the impact bighorn sheep reintroduction could, and likely will, have on domestic sheep operations in and around the areas proposed for transplant. MWGA has made clear to the Department many times that a majority of the scientific information on bighorn sheep – domestic sheep disease transmission is done in a laboratory, and not in the wild. To the extent FWP manages bighorn sheep to prevent interaction between the two sheep species, MWGA's membership will work with FWP's staff to ensure the success of those policies. However, again, MWGA's membership requests that the Department recognize

that many of Montana's bighorn sheep die offs have occurred in populations not located anywhere near domestic sheep operations. Further, MWGA's membership also requests that the Department recognize publicly that it is the Department's policy to kill individual bighorn sheep when there may be an interaction with domestic sheep and that domestic sheep operations are not at fault for such interactions merely because they produce domestic sheep.

- MWGA's membership reiterates also the comments made at the public meeting held in Bozeman on this project by some agriculture producers that, in order for either of the proposed transplant alternatives to work, FWP must work with, listen to, and establish good relations with existing agriculture operations.
- The Final EA should recognize that the time period for which bighorn sheep – domestic sheep interactions is highest is in the fall and into early winter and any planning for domestic sheep-bighorn sheep interaction should focus on that reality.

MWGA is pleased to be a partner in the management of bighorn sheep and we look forward to working with FWP staff to ensure the health and viability of this important wildlife species. Like all Montanans, MWGA's membership hopes that Montana's bighorn sheep population will prosper under this Strategy; and the Association will work cooperatively with the Department to ensure the successful transplant of sheep into the Bridger Mountains area if the Department chooses to move forward with Alternative "B" or "C". Finally, MWGA's membership is particularly interested in this project because of its proximity to Montana State University and the excellent research facilities and research staff located there. With proper protections for livestock producers being put into place prior to reintroduction, this project could be a win-win for all interested parties.

Sincerely,

James E. Brown

Director of Public Affairs

Montana Wool Growers Association

Appendix C

Bridger Mountains Bighorn EA Email Comments

The following comments were made via email during the November 5-26, 2012 public comment period:

Comment #1: (Betsy Hamann; White Sulphur Springs) I just reviewed the EA for transplanting sheep in the Bridgers. It is apparent from the information presented in the EA, that it would be a high risk project. Currently, there are several domestic herds in proximity as well as mountain goats in the Bridgers. Something else has been an issue in other areas is that sheep come down on the “flats” in the winter, such as the herd in the Flints just outside of Anaconda. That herd came down onto the highway, dawn to salt that was added to sand used on the highway. The sheep would not move off of the road, people would drive through them in their cars (one guy killed eight when he ran into them on the road). As I understand it, the county had a hard time finding salt-free sand to use on the highways in the winter. That issue may be resolved by now, but is that a concern here? While your model looks at habitat in the Bridgers, maybe you should consider what other herds have done and incorporate more of that info into your analysis (use of lower elevation private lands). In summary, I hope that you will consider the information presented in your own EA, and drop this proposal as it is too risky and appears to not be supported by adjacent landowners. While I totally support seeing native species put back into unoccupied habitat, the Bridgers do not appear to be suitable for bighorn sheep at this time.

Comment #2: (Bert Otis; Emigrant) I support Alternative C for the reintroduction of Big Horn Sheep in the Bridger Mountains. If the existing landowners with sheep and goats aren't willing to work with FWP then there's no sense wasting money on this project. I think the project would be GREAT if the landowners will support it. If this option doesn't work out, maybe you should consider Paradise Valley, Pine Creek/Mill Creek/Emigrant Creek area. We have a small herd existing in Mill Creek area from a reintroduction in the 80's???? Maybe now would be a good time to try again to reintroduce them in Paradise Valley. Both Dave & Paul Rigler & John Pierce sold their ranches and the new owners no longer run sheep, so as far as I know there's only three sheep producers in the valley. All of them are away from the mountains on the valley floor, so it might be worth looking into, if you haven't done so already. Lew Wilks bought the Rigler Ranch & I bought the John Pierce Ranch which both used to run sheep between Mill Creek & Emigrant Creek at the base of the mountains, Neither of us have any plans to raise sheep in the future.

Comment #3: (Lynn Carey; Seeley Lake) I am very much in favor of reintroduction of bighorn sheep in the Bridgers. Anything that can be done to help bighorn sheep.

Comment #4: (William Brewster; Belgrade) Thanks for the update on the Bighorn sheep reintroduction. My mother is Barbara Brewster at Dryfork Ranch in the Bridgers, and you have been keeping in touch with her lately. I live here on the family ranch. I was in contact with feels

the same way, but I am willing to help out in whatever way that can make this process happen. I am a professional photographer, so maybe this can be available for you.

Comment #5: (Jerry Davis; Helena) I haven't finished reading the EA but I think it is time to do this. Intuitively the Bridgers just seem like a logical place for sheep, and the majority of the lands are public.

Comment #6: (Dick Shockley; Gallatin Gateway) This email is sent in support of introducing big horn sheep into the Bridger Mountains range. Property owner off Brackett Creek Rd, Horse Creek headwaters, Battle Ridge, Bridger Mountains.

Comment #7: (Michael Vickerson) I have read the outline for the sheep restoration in the Bridgers and I support it whole heartedly. This will be good for Sheep as well as the nearby communities.

Comment #8: (Brian Koelzer) It would be GREAT to see sheep in the Bridgers. I hope it can be put together this time.

Comment #9: (Jack Jones; Butte) What FWP should really concentrate on is how to restore and manage MULE DEER. The Bridger Mountains were at one time a fabulous mule deer range with a good population of mule deer. Forget about bighorn sheep. MULE DEER have nearly disappeared from every mountain range in Montana. Quite frankly I don't believe FWP has a clue about mule deer management and more specifically "GAME MANAGEMNT". FWP is so intent on listening to the radical environmentalists these days they are completely out of touch with reality. It's the hunters who pay the bills but hunters are no longer important to FWP. Stop listening to these radical environmentalist and foolishness about re-establishing bison all over Montana and bighorn sheep in the Bridger Mountains for the environmentalist to look at. When will FWP understand what is happening in Montana? FWP is on an environmental agenda not a game management mission and not in touch with reality. Wolves have decimated elk and moose in many areas of Montana but FWP has no policy to control wolves to protect and manage big game like Alaska does. FWP is failing more each year. I give Montana FWP a D-for game management in Montana correction:"F" and the commission is hopeless. FWP does not have a strategy for measuring vegetation (habitat) or seems to care and no one measures anything. How does FWP know what is utilizing the vegetation? The browse is there but no mule deer browsing on it why is that? Leadership within FWP is non-existent.

Comment #10: (David Coffin; Bozeman) I live about 4 miles north of Reese Creek, near Dave Lambrecht, and I am very excited at the prospect of having sheep back in the Bridgers. I elk hunt in the Bridgers as well as hike and ride trail bikes, the thought of being able to see sheep back in their traditional range, in addition to deer elk, moose and bears...is simply icing on the already fantastic cake, Thanks so much for your work on this project and I hope it gets approved. If I can help in any way, please let me know.

Comment #11: (Norm Bishop; Bozeman) Great idea. I support Alternative B. Thank you for the opportunity to comment.

Comment #12: (George Wuerthner; Helena) I fully support the reintroduction of bighorn sheep into the Bridger Mountains. Of the alternatives presented, I am in favor of alt. B. I believe bighorn restoration is ethically, ecologically and economically justifiable. I hope MDFWP can reestablish a herd in the range based on the following observations made in the EA. (1) Bighorns should be reintroduced based on ethical reasons. Bighorns were a native species in the area. Reintroduction helps right a wrong—namely the extirpation of a valued and important native species. (2) There is sufficient suitable habitat to support a large bighorn herd. (3) Establishment of a herd in the Bridgers could help native herds in the Gallatin Range by providing potential genetic connections. (4) Bighorn establishment in the Bridgers may be a new food source for wolverine. Wolverine tend to travel at higher elevations—which bighorns are likely to utilize. When a bighorn dies, it may provide wolverine with a rich source of food, especially if death of a bighorn were to occur in the winter months. (5) Given the location near Bozeman, and the amount of recreational use in the Bridgers, establishment of a bighorn herd would provide opportunities for wildlife watching. (6) While conflicts with domestic sheep are possible, the Bridgers are sufficiently distant from on-going sheep operations to have a reasonable chance of avoiding disease transmission and die-off due to domestic livestock. (7) As a property owner in near-by Livingston, I support any efforts at wildlife enhancement as I believe this actually increases one's property values—though this is by far and away the least important reason for reintroduction. Thanks for the opportunity to comment.

Comment #13: (Howie Wolke; Emigrant) I am a wildlife conservationist, wilderness guide and avid hunter and I heartily support reintroducing bighorns into the Bridger Mountains (and any other areas of historic sheep habitat where they've been extirpated). Restoring populations of all native wildlife species, not just game species, to former habitats is an extremely important facet of conservation. For bighorns in the Bridgers, alternative B is the best plan. It's a great idea, so do move forward. Thanks!

Comment #14: (Jack Chambers) I support the effort to restore bighorn sheep to the Bridger Mountain Range. We desperately need areas like this to move wild sheep.

Comment #15: (Dan Porter; Bozeman) I appreciate all that you are doing to bring bighorn sheep back to the Bridger Range. I think hunting sheep and goats in the high country is the ultimate hunting experience in Montana and we should promote every opportunity possible to increase that opportunity for Montana hunters, Thanks, and keep up the good work. If there is anything I can do to help, let me know.

Comment #16: (Glenn Hockett; Gallatin Wildlife Association, Bozeman) On behalf of the Gallatin Wildlife Association please know our organization supports the reintroduction of bighorn sheep into the Bridger Mountain Range. As you know, we and other have been working

very hard to restore bighorn sheep to the Bridger Mountain Range for years. The primary recovery area is 85% public land (Gallatin National Forest) and we will continue to build the already substantial public support to pursue this effort. Key to this introduction moving forward successfully is securing a cooperative effort with local woolgrowers that run domestic sheep on nearby private lands. We are encouraged because there are a number of local woolgrowers that support the transplant and we will continue to work with them and other landowners in the area to build understanding, cooperation and support for a bighorn reintroduction. We recognize there is risk here and that bighorns and domestic sheep cannot come together. However, we also see an unprecedented opportunity to build community awareness, cooperation, effort and support among diverse constituencies to work on ensuring bighorns and domestics stay separated. We suggest FWP approve this reintroduction while continuing to foster a spirit of cooperation among all parties. We suggest collaring many of the reintroduced bighorns, in particular young rams, and intensively monitoring these animals. Perhaps cost sharing opportunities could be pursued to facilitate bighorn monitoring/domestic sheep mitigation measures. Both the National Wildlife Federation and Gallatin Valley Land Trust have offered to help out if necessary. We believe other groups such as the Wild Sheep Foundation and the Safari Club International would also help out. If there is anything the Gallatin Wildlife Association can do to facilitate this reintroduction please let us know. We would also like to see MSU, the MSU wildlife group, Bozeman High School wildlife biology class and local 4H chapter involved in this project if they would like to help out.

Comment #17: (Charles and Jane Allen) We strongly support the reintroduction of bighorn sheep in the Bridger Mountains.

Comment #18: (Kenneth Hamlin, Retired FWP Wildlife Research Biologist, Bozeman) I believe that Alternative A – No Action is the only legal, policy compliant, and biologically logical alternative/action. See comments attached below.

Kenneth L. Hamlin Comments On: Environmental Assessment for the Potential Reintroduction of Bighorn Sheep into the Bridger Mountains, Southwest Montana.

Alternative A – No Action is the only legal and logical choice for MFWP as discussed immediately below and throughout my response.

EA p. 10

*"MFWP policies and guidelines are directed by state law (MCA 87-5-701-721) which provides for the importation, introduction, and transplantation of wildlife. This statute provides that transplantation or introduction of any wildlife is prohibited unless the MFWP Commission determines, based upon scientific investigation and after a public hearing, that a species of wildlife poses **no** threat of harm to native wildlife and plants or to agricultural production and that the transplantation or introduction of a species has significant benefits."*

MCA 87-5-701-721 as directly quoted above is likely unfortunately worded and the word **NO** (highlighted above) should probably be minor or minimal (or similar wording). However the wording in the Statute is NO. MFWP in it's own EA documents and as discussed below under Issue 4 cannot say that NO harm to native species will occur. Therefore, Alternative A – No Action is the only Alternative legal by Statute.

My further comments are organized as follows: First, comments on the 6 specific issues listed and addressed. Next, process issues, overall comments on the proposed reintroduction, and any interactions of issues.

Issue #1: Bighorn Sheep Habitat Suitability; Do the Bridger Mountains contain sufficient bighorn sheep habitat to produce and support a Minimum Viable Population of bighorn sheep (N=125 bighorns)?

This procedure/modeling apparently has been preliminarily validated as far as predicting habitat use in the Elkhorn Mountains (Montana Bighorn Sheep Conservation Strategy, pp. 60-61, Figure 8). Has it been validated for accuracy in predicting population levels using existing viable populations?

EA pp. 13 & 14

*"This procedure was applied to the Bridgers (MFWP 2012; Appendix C), and based on habitat calculations MFWP expects the Bridgers to support 160-350 bighorn sheep depending on how they use the available habitat. **The estimated population is based on all available habitats across the entire mountain range. It may take many years or decades for a transplanted population to disperse throughout all potential habitats and reach their highest numbers.**"*

Based on previous relocation experiences, what is an estimate of years/decades to a huntable population?

Given that this estimate is based on habitat in the north end (Ross Peak north) of the Bridger's being occupied, very little discussion occurs relative to some unique problems in that area (e.g. condition could change and large landowners to the north could "reintroduce" domestic sheep for economic or "other reasons") and also for the areas around Sypes Canyon and the "M"/mouth of Bridger Canyon. e.g. Appendix C, p. 71 - "Therefore, it is possible that realized population size may be on the lower end of what could be expected without additional augmentation to elsewhere in the Bridgers as well. " **Unaddressed Cumulative Effects.**

Issue #2: Disease Transmission; Is there a significant risk for disease transmission between domestic sheep and bighorn sheep in the Bridgers?

EA pp.14 &15

*"With regard to potential bighorn transplants, the physical separation of domestic sheep from bighorns is the recommended way to avoid disease transmission. Zeigenfuss et al. (2000), when looking at a number of successful and unsuccessful bighorn sheep transplants, found that successful transplants were an average of 23 km (14.3 miles) from domestic sheep. Similarly Singer et al. (2000), when evaluating success of 100 bighorn sheep transplants, found that the 15 successful populations were an average of 20 km (12.4 miles) from domestic sheep. **MFWP does not recommend placement of bighorn sheep within 23 km (14.3 miles) of domestic sheep herds without clear physical separations (i.e., major highways, rivers, double fencing, or other barriers) (MFWP 2010).**"*

"In the Bridgers, there are a minimum of 10 domestic sheep herds within 14 miles of the proposed sheep release site (Figure 2). Five are large herds (100 +/- 25 sheep), 3 are medium sized (20-50 sheep), and 2 are small herds (2-4 sheep) all located within 1.5 – 12 miles from the release site (Table 1). None of these herds currently have clear physical separations from the potential bighorn sheep population."

Appendix C. pp.68-69

"Discussions with the wildlife laboratory and other wildlife biologists with first-hand experience related to die-offs suggest that this reintroduction would be a high-risk effort given this number of domestic sheep operations within the minimum radius from the habitat and relocation site. It is likely that reintroduced sheep will face a die-off risk, be it in one year or ten years."

Appendix F. p. 82

"Based upon the biologist's evaluation of the potential reintroduction site, and the current science of bighorn sheep pneumonia as summarized and presented in resources such as WAFWA's "Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat" and Montana Fish, Wildlife & Parks

Bighorn Sheep Conservation Strategy, I view a reintroduction of bighorn sheep into the Bridger Mountains to clearly be a high risk reintroduction under current circumstances, and hope that decision makers will consider the potential consequences of carrying out a reintroduction that is so clearly identified as a high risk reintroduction.

Jennifer M. Ramsey D.V.M., M.P.V.M., MFWP Wildlife Veterinarian

EA pp. 15 & 16

"MFWP has developed a detailed protocol for actions and timeframes for responding to bighorn sheep die-offs (MFWP 2010; pg. 54-57). Reports of a possible die-off typically trigger a large scale aerial and ground monitoring effort to include sheep counts and collection of carcasses and removing (killing) any sheep that appear sick. Biological samples are collected and sent to wildlife labs that specialize in disease diagnosis. All potential contacts between bighorns and domestic sheep are investigated. Documenting exactly EA what takes place and clearly 16 communicating facts to the public are critical to dealing with a bighorn sheep die-off. The entire process may take several months, require additional personnel, incur significant survey and laboratory costs, and result in a disappointed and frustrated public. Post die-off impacts may include closing bighorn hunting seasons, eliminating the potential for using the area as a source of sheep or a possible transplant site for several years, and creating tension and poor relationships between the public and landowners."

A failure is not just a failure. It can have significant financial & social cost that must be considered. Examples of initial and follow up costs (\$\$, personnel time, landowner relations) for the Greenhorn reintroduction, for example, would have been relevant.

There is no discussion in the EA of the certainly relevant recent past experiences (disease and otherwise) with reintroductions into the Greenhorns, Elkhorn's, Tendency's, Sleeping Giant, and Beartooth WMA areas.

Given EA p 13-14 *"The estimated population is based on all available habitats across the entire mountain range."*, there should be more discussion about domestic sheep locations or the potential for domestic sheep locations in areas of the Bridger's beyond the 14.3 miles from the proposed initial release site (14.3 miles from anywhere in the Bridger's).

The Disease issue alone, in my opinion, is sufficient to preclude this reintroduction at this time (Alternative A). Perhaps more MFWP money should be directed to research into bighorn sheep disease prevention, mitigation, resistance, etc. rather than further failed & costly reintroductions. There are descriptive pejoratives, which I will not use here, regarding continuing to perform the same action and expecting (hoping for) a different result.

Issue #4: Competition with Other Wildlife Species; Is it likely there would be significant competition between reintroduced bighorn sheep and existing wildlife species in the Bridgers?

EA p.20

"Dave Pac (now retired) was asked to comment on the current bighorn transplant and the issue of competition with mule deer under the current conditions. Mr. Pac has concerns about releasing bighorns when deer numbers are low due to possible competition on winter range habitat. He did not recommend releasing bighorns at this time. "

EA p. 60

"MFWP mule deer research biologist Dave Pac (retired) wrote that it would be "ecologically irresponsible" to introduce a potential competitor when mule deer numbers are at the current low levels (1/21/11). The starting population level of each species can be an important factor in whether a 2-species competition results in competitive exclusion or coexistence (Begon et al. 1996)."

EA p.20

"There is currently a mountain ungulate research initiative underway in the greater Yellowstone area (Garrott et al. 2010) that may eventually clarify the relationship between mountain goats and bighorn sheep. An initial literature review indicates that mountain goats and bighorns may overlap on summer or winter range, mountain goats may harbor parasites and pathogens that may infect bighorns, there is some dietary overlap but scale is important when considering resource similarities and differences, goats can be dominant over bighorns, and there is a lack of empirical data for sympatric populations where both species are doing well."

EA p. 64

"My recommendation is to wait to reintroduce bighorn sheep into the Bridger Mountain Range until the Greater Yellowstone Area Mountain Ungulate Research Initiative is completed. This project is designed to quantify bighorn and mountain goat relationships across their range, and predictive models will be developed that would be readily applicable to the Bridger Mountains."

Based on the above, along with my experience working with mule deer in the Bridger Mountains from 1973-75, occasionally assisting Dave Pac from 1976-2006, and setting at a desk 10 feet from him during 1984-2006, I would be very cautious about the potential for conflicts among mule deer, bighorn sheep, and mountain goats. Although most EA comments have focused on winter range, I would also be very cautious about the potential future condition of fragile "alpine"/subalpine habitat along the Bridger Crest. Three species (+ some minor elk use) of this

environment could lead to an Olympic National Park, Washington situation. The mule deer use of this "alpine"/subalpine habitat is primarily by the "trophy" mule deer bucks managed for under current regulations. **You certainly cannot say that there will be NO effect of the reintroduction on native species.**

Issue #5: Conflicts in Rural Subdivisions; What is the potential for bighorn sheep to seasonally use and create management conflicts in low elevation subdivisions adjacent to the Bridgers?

EA p. 21

"Wild ungulates including bighorn sheep may use and create conflicts in rural subdivisions. A few conflicts with bighorns have occurred in western Montana where subdivisions border bighorn sheep winter range habitat in close proximity to escape terrain. Conflicts include grazing and browsing in yards, interactions with family dogs, minor property damage, and human safety/vehicle collision concerns. In general, the bighorn sheep habitat in the Bridgers occurs away from private land subdivisions except for the Middle Cottonwood Creek proposed reintroduction site and the Ross Peak area."

I believe you are underestimating the potential for conflicts with bighorn sheep and subdivisions (housing development). First, if successful, I believe there could be strong sheep establishment from the Sypes Canyon subdivision area south to the "M" through the mouth of Bridger Canyon. This area has substantial housing development. Further, your habitat model seems to be based on information that does not include the sometimes-substantial acclimation/habituation to humans observed from the desert southwest to Banff, Canada. "Escape terrain" from native predators and other factors can be into developed areas. Also, nutritious and otherwise attractive feeding sites and salt and mineral sources can be in human occupied developed areas. There is much risk for a "boutique" sheep herd establishing in the southern Bridger Mountains, which would affect harvest potential [Comments in the 1994 EA (Alt, 1994) indicated some of the interest in reintroducing bighorns was "anti-hunting"], land and trail use, vehicular collision and injury/death potential, and personnel response time and cost.

Issue #6: Public Land Access and Use Restrictions; Will the reintroduction of bighorns result in changes in public land access or restrictions on existing recreational activities?

EA p. 22

"With respect to the proposed bighorn sheep transplant MFWP is not making any recommendations for changes to public access or recreational activities on the Gallatin National Forest. MFWP concludes that current levels of activities

occurring in the Bridgers including motorized and non-motorized recreation are compatible with a successful sheep transplant. The Gallatin National Forest is also not recommending any changes in public access or recreational activities as a result of the proposed bighorn sheep transplant. Any future management changes regarding access and recreation on the Gallatin National Forest would go through the established Forest Service public planning and comment process."

The above becomes totally meaningless should "boutique" bighorn sheep herds establish from Sypes Canyon to the "M". There would likely be substantial public pressure relative to disturbance (disease inducing stress) via public hiking (along with their ever-attendant dogs) on trails in this area. There would also be outcry against such restrictions. Further, regarding the statements in the highlighted paragraph from p. 22 of the EA such as "no changes recommended at this time", you surely must realize that millions of people across the U. S. find government proclamations and assurances such as these laughable (or "cryable", to coin a word) based on previous experience.

PROCESS ISSUES:

I found a complete lack of any Economic Analysis that should have occurred under MEPA sections such as: Impacts on the Human Environment, Risk/Health Hazards, Community Impacts, Or Public Services, Taxes, Utilities.

Given the current state of MFWP income vs. expected expenditures and the future (given the most optimistic scenario, 2015-16 for any relief). MFWP should be concentrating on spending hunter-derived income to maintain essential current operations and Programs, NOT HIGH-RISK reintroductions. As stated earlier, research into bighorns sheep issues would be most productive prior to further reintroductions. See: Montana Bighorn Sheep Conservation Strategy, p. 42, "*We agree with Bleich et al. (1996) that the protection of the integrity and health of existing populations and metapopulations has to be the first priority in management of bighorn sheep as opposed to creating new metapopulations.*"

Similarly, there was no estimation or discussion (that is necessary because of the past failures) of the costs relative to benefits of reintroductions to MFWP and society. There are other sections as well where cost/benefit discussion should occur.

In the foregoing, I have pointed out one Cumulative Impacts issue to be addressed. I believe that others will occur when taking into account the entire body of my comments.

SUMMARY

I believe that Alternative A – No Action is the only legal, policy-compliant, and biologically logical alternative/action.

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Comment #19: (Nancy Schultz, Gallatin Wildlife Association, Bozeman) I support the reintroduction of bighorn sheep into the Bridger Mountain Range. I understand that it is key to this reintroduction to get cooperative effort from locals that run domestic sheep on private lands. However, it was hopeful to hear at the public meeting on this reintroduction that the largest domestic sheep producer is in favor of the FWP release. Also at the public meeting many private landowner concerns were addressed such as landowners will not be held liable if negative issues arise, and that private property rights will not be affected.

I know that this reintroduction comes with potential risk, and managing risk will go to FWP. I feel the risk can be managed and this reintroduction is worth the effort FWP will put into it. If there was a better area for a reintroduction that has less risk there might be a different comment, but since there is nothing else on the table, I think – go for it. The opportunity to build community awareness and cooperation among those who share this magnificent mostly public landscape cannot be overstated. There are willing groups out there-Gallatin Valley Land Trust and the National Wildlife Association and others will likely join.

Comment #20: (Glenn Monahan, Bozeman) I am writing to you today to offer comments on the proposed reintroduction of Bighorn Sheep in the Bridger Range.

The primary reason to proceed with the reintroduction is the fact that Bighorns are native to the area. An opportunity to rectify the mistakes and poor judgement of our ancestors that have led to the absence of a native species in their former range should be of the highest consideration in deciding in favor of this reintroduction.

Also, given that the reintroduction will occur on a landscape that is overwhelmingly public land, provides another strong reason for you to proceed. I reject the idea that local landowners have valid reasons to be opposed to this reintroduction, nor do I feel that “land ownership” carries with it any overarching “rights” to oppose native wildlife on public lands. A “landowners opinion” on this matter should carry no more weight than any other Montanan.

I feel that it is particularly significant that the largest local sheep producer testified in favor of the reintroduction. Thank you,

Comment #21 (Rob Arnaud, Montana Hunting Company, Bozeman) I support the reintroduction of bighorn sheep into the Bridger mountains. This action is a positive both for bighorn sheep and for the people of MT.

Comment #22: (Mike Colpo, Lazy J Bar O Outfitters, Big Timber) TO MTFWP : After reading the ESA and the fine work put in by FWP on the proposed Bridger Bighorn Transplant I feel there is no way to support a transplant at this time. There are too many risk involved with the domestic sheep operations whether it be large or small. I also feel that this transplant would go against the MT Sheep Management Plan that is already in place. If this was to move forward the only viable option is Plan C. I would support this transplant as a concerned sportsman and bighorn sheep advocate if the science

proved this was the right thing to do, but it doesn't show that. I know we need alternative release sites within the state and I believe those need to be looked at harder before this type of proposed transplant should go forward. Mike Colpo P.O. Box 1753 Big Timber MT. 59011 [406-932-5687](tel:406-932-5687)

Comment #23: (Bill O'Connell, Bozeman) I would like to express strong support for reintroducing bighorn sheep into the Bridger range, and address some of FWP's concerns.

A brief bit of relevant background; the proposed release site is Middle Cottonwood Canyon, which is basically our back yard. I have hiked and hunted this area extensively, starting in the early 80's. We also operated a wild game processing plant beginning in that same time period, and processed thousands of mule deer out of the Bridgers. Dave Pac used to stop by on a regular basis, and age mule deer that we knew were locals.

I have clearly seen the striking decline in mule deer numbers since then. In fact two summers ago I took a hike up to one of my old camps, near the Cottonwood/Bostwick divide. I was somewhat astounded that I used to take packstrings of horses through there, as the trail I used basically doesn't exist anymore! Clearly, mule deer numbers have plummeted, and no one's exactly sure why.

Going to more restrictive regulations doesn't appear to have helped, even though my son lucked out and got the best buck in the neighborhood a few years back, right here on the farm! We still hunt elk in the Bridgers, and aren't seeing much for mulies.

I just can't buy into using that as a reason to not reintroduce bighorn sheep, however. I don't see any reason to expect the trend in mule deer populations to make a dramatic reversal anytime in the "foreseeable" future. The idea that competition from bighorns would be to blame for continued mule deer declines is ludicrous, a vast oversimplification.

The other significant issue is gaining support from the larger landowners in the area. Being a farmer myself, I know most of them, and have spoken with a notable percentage. Frankly, most of them are not going to agree to allowing public access, or even access to FWP for bighorn management. I don't really blame them. I have also spoken with quite a few other residents of the area, and support for bighorn reintroduction is overwhelming. In fact I haven't spoken with any non-ag residents who are opposed to it. People would love to see bighorn sheep in the Bridgers, and view it as a tremendous asset to the community. This brings us back to a fundamental flaw of the bighorn sheep plan.

If a single larger landowner opposes the reintroduction, it won't happen. Even the handful of landowners who oppose it now represent a very small percentage of the total, but even if it was only one, the transplant won't happen.

Far better to agree to work together, and address their concerns in a collaborative manner, which is what we are stressing needs to happen here. Surely it's noteworthy that the only significant sheep

producers in the area have guard dogs that don't even allow deer into their pastures, and they support this reintroduction project.

So yes, there is some risk of disease transmission between domestic sheep and bighorns, although I don't necessarily agree that this area is "high risk". I am not aware of anywhere that would be completely free of risk, which explains why there aren't any other prospective release sites on the table. At some point I feel this becomes a dereliction of responsibility from the wildlife agency. This release site is almost completely public land, has no domestic sheep grazing allotments, is supported by the only significant area sheep producers, and offers a unique opportunity to address landowner concerns in a collaborative manner.

That is why none of the alternatives in the EA as written are acceptable. We will continue to urge FWP and the Commission to make this a collaborative process with sportsmen, wildlife advocates and area agricultural producers, and hopefully, someday we'll have bighorns here in the "back yard".

Comment #24: (Barbara Brewster, Belgrade) I reiterate my opinion that I shared at the MFWP public meeting on November 15, namely, that this transplant should no longer be considered viable or humanely, ecologically or fiscally responsible. My primary reasons for objecting to the transplant follow.

1. I have confidence in our wildlife experts. The consensus of at least seven Montana biologists, veterinarians, bighorn conservation strategists and western association wild sheep groups is that reintroduction would be a high risk effort due to the proximity of domestic sheep herds.
2. Experiences of five western states agree with our experts. A plethora of articles in research journals, wildlife publications and on internet search sites (See bighorn sheep diseases) unequivocally concur with Montana's wildlife experts that the bighorn sheep are highly vulnerable to a fatal disease transmitted by domestic sheep. Documented reports are of mortality rates of 75-90% of the wild herds. For example, A Reuters article datelined October 2010, Salmon, Idaho, states that since winter nine disease outbreaks across five states in the West have claimed nearly 1,000 bighorns. Cause: Contact between bighorns and domestic sheep.
3. Close proximity to domestic sheep. High mortality rate in the Bridgers would be inevitable given that at least 15 domestic sheep herds exist closer to the west side of the Bridgers than the recommended 14-14.3 mile separation. (I add the 4H family sheep projects that I know of within 1.5-to-5 miles not identified in the MFWP map.) A total of 21 4H families have sheep projects in the Gallatin Valley, so more may well be within close range of the Bridgers.
4. Mule deer. Retired deer research biologist Dave Pac expresses our concerns for a once-thriving mule deer herd that is finally slowing showing modest but positive signs of recovery. We feel that we have been intimate enough with that herd to concur with Mr. Pac that it would be "...ecologically irresponsible" to add a competitor on mule deer winter range.

5. Drought. It seems irresponsible and shortsighted to add yet another species to an area already facing diminishing sources of forage and water due to drought.

6. Double fencing. I ask myself how that might interfere with wildlife corridors and I see obstruction of the natural movements of deer, elk, moose, bear, etc., to/from water, safety zones and forage. Cost aside, I see double fencing causing more harm than good.

In closing, I reserve judgment regarding if or how much reintroduction of bighorn sheep will affect our ranch income from cattle. Though bighorn may represent 1/5 AUM, our high range is late fall/early winter range for cattle. Further, although it is true there are no grazing allotments for cattle or horses in this part of the Bridgers, large tracts have been overgrazed for several years by domestic stock.

Thank you for all the work you have put into this project.

Comment #25: (Alex Russell, Bozeman) I strongly urge you to proceed with the reintro of Bighorns in the Bridgers. I realize there is risk associated with the reintro, but I see the only other alternative as no reintro anywhere in the state and a continued decline in bighorn population. There are no easy answers but no action should not be the only alternative.

Comment #26: (Robert Biggs, Belgrade) Local sheep producer opposed to reintroducing bighorns.

I am glad to get a chance to let you know how I feel about the re-introduction of the Big Horn Sheep in to the Bridger Mountain range. I appreciate the time and effort that you have put in to this project, and appreciate your attempts to get all of us who are involved to have ample opportunity to express our opinions! Being a fourth generation farmer and rancher in the Springhill area, the Bridger Mountain Range has been an important part of our lively hood since the early 1880's. We have always enjoyed seeing wild life in our area, and do what we can to co-exist with them. It is a concern of ours to see another type of animal that has not been seen here several generations be introduced in to the area. There are a few reasons that we are skeptical that this is a good idea. I have read several articles in the last year or so that have explained what has happened to peoples property rights and availability of sheep grazing areas when Big Horns are introduced. Several grazing leases on BLM and Forest Service lands have been terminated in Idaho from the Payette Forest decision. The Idea of the land owners needing to double fence their property at their own expense is preposterous! Not only is it expensive to put up a fence around the property in addition to what is already there...now we would have twice the fences to maintain. Along with the extra fencing to do we would in essence loose a strip of ground all of the way around the property...just like a business on main street...every square foot counts to us to make us money. The threat of a disease in the heard is also a red flag to me...not only from our domestic sheep heard to the Big Horn population, but there is no guarantees that we wouldn't be threatened by the wild heard brining something that we haven't seen as well. As we operate now our sheep heard is more in the valley, however, there is nothing that says that we wont have sheep in our upper pastures next to the forest service in the years to come. As an example domestic sheep were

worth twice what they had ever been last year making sheep a lucrative business. if those prices were to return and stabilize, I may want to expand our current heard, if I was to do this we would be brining them to pastures next to Forest Service ground that would be in more direct contact with the Big Horn sheep, and in turn I am sure would require much fencing and safety procedures to assure no contact with the wild heard. The push these days is for more sustainability in farming and ranching, and these extra things that would need to be done are a detriment to the rancher...certainly not supporting sustainability. I Do not want to tie my hands as to what I can and can not do on my place by allowing a wild animal to be there that only a hand full of people would be able to enjoy....in todays economy I think that food production and a lively hood that has historically been in place should be an important consideration . I hope that this is taken as good input as the reasons to my opposition to the re-introduction of the Big Horns in the Bridger Range! Ultimately I want to be able to continue ranching in the area with the type of animals that we currently have which include sheep, and with todays narrow margins do not want the expense and hassle that could be imposed upon us. Thank you for your time.